



*United States Attorney  
Eastern District of New York*

EAG:NMA/RN/AL  
F.#2009R00153

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Brooklyn, New York 11201*

June 11, 2012

By ECF and Email

Gerald J. McMahon, Esq.  
The Standard Oil Building  
26 Broadway, 18th Floor  
New York, New York 10004

Re: United States v. Francis Guerra  
Criminal Docket No. 10-147 (S-4) (SLT)

Dear Mr. McMahon:

The government provides this letter regarding trial in the above-captioned case.

The government intends to call Jennifer Giordano to testify at trial that Oxycontin contains Oxycodone HCL, which is form of Oxycodone. The government intends to call Ms. Giordano as a fact witness, because she is employed by Purdue Pharma L.P., the manufacturer of Oxycontin, in that company's formulary group, and therefore has personal knowledge of the contents of Oxycontin. However, in an abundance of caution, the government hereby advises you pursuant to Rule 16(a)(1)(G) of the Federal Rules of Criminal Procedure that the government may call Ms. Giordano as an expert witness and that she would testify as set forth above. The government will provide you with Ms. Giordano's resume shortly.

If you have questions or requests regarding the contents of this letter, please contact us.

Very truly yours,

LORETTA E. LYNCH  
United States Attorney

By: /s/  
Nicole M. Argentieri  
Rachel J. Nash  
Allon Lifshitz  
Assistant U.S. Attorneys  
(718) 254-6232/6072/6164

cc: Clerk of Court (SLT) (by ECF)